

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
DARRELL F. CRABBS, JR. : **CASE NO. 1-15-03051-HWV**
MELISSA KAY CRABBS :
 Debtors :
 SUNTRUST BANK, :
 NOW TRUIST BANK :
 Movant :
 v. :
 DARRELL F. CRABBS, JR. :
 MELISSA KAY CRABBS :
 Respondents :

**DEBTORS' RESPONSE TO MOTION OF
SUNTRUST BANK, NOW TRUIST BANK
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come Debtors, Darrell F. Crabbs Jr. and Melissa Kay Crabbs, by and through their attorney, Gary J. Imblum, and respectfully respond as follows:

1. Admitted.
2. Admitted.
3. Admitted in part and denied in part. The Contract and Title speak for themselves.

Strict proof is demanded.

4. Admitted in part and denied in part. The Contract terms speak for themselves.

Debtors have no knowledge as to the fair market value of the vehicle. Strict proof is demanded.

Debtors sent Movant \$800.00 on July 20, 2020 and \$700.00 on July 21, 2020. Debtors will have the remaining amount necessary to cure the arrearage through July by July 31, 2020.

5. Denied. By Movant's own admission, the net loan balance is \$9,787.11 and the clean retail value of the vehicle is \$28,025.00. Accordingly, there is a significant equity cushion providing adequate protection to the Movant. Further, Debtors are providing adequate protection through regular monthly payments.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



Gary J. Imblum
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Attorney for Debtors

DATED: 7/28/20

CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTORS' RESPONSE TO MOTION OF SUNTRUST BANK, NOW TRUIST BANK FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

CHARLES J. DEHART III, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

dehartstaff@pamd13trustee.com

WILLIAM E. CRAIG, ESQUIRE
MORTON & CRAIG, LLC
COUNSEL FOR MOVANT
VIA E-SERVICE

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For Debtors

DATED: 7/28/2020